

IN THE  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

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No. 4:23-cr-00346

ANDREW VENEGAS

UNOPPOSED MOTION FOR CONTINUANCE AND RESET ALL DEADLINES

TO THE HONORABLE JUDGE KENNETH M. HOYT:

COMES NOW, Andrew Venegas, who respectfully requests this Honorable Court to enter an order continuing this cause and in support thereof would show as follows:

1. The United States Government is unopposed to this motion.
2. The case is currently set for Sentencing on June 16, 2025.
3. Mr. Venegas is cooperating with the United States Government, and Defense Counsel and the United States Government are in the process of plea negotiations.
4. The United States Government is unopposed to this motion.
5. This motion is not made for delay.

WHEREFORE, PREMISES CONSIDERED, Defendant requests that this Honorable Court grant this motion and reset the sentencing and all other deadlines for 90 days or whichever date this Honorable Court sees fit.

Respectfully submitted,

PAUL DOYLE & ASSOCIATES, P.C.

By: /s/ Paul Doyle

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1<sup>st</sup> day of May 2025, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Paul Doyle

Paul Doyle

Attorney for Andrew Venegas

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on the 1<sup>st</sup> day of May 2025, Luis Batarse, Assistant United States Attorney, stated he was unopposed to this motion.

/s/ Trevor Sharon

Trevor Sharon

Attorney for Andrew Venegas